

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

nCUBE CORPORATION (now ARRIS	)	
GROUP, INC.),	)	
	)	
Plaintiff-	)	
Counterclaim Defendant,	)	C.A. No. 01-011 (JJF)
	)	
v.	)	
	)	
SEACHANGE INTERNATIONAL INC.,	)	
	)	
Defendant-	)	
Counterclaimant.	)	

**ARRIS'S MOTION TO HOLD SEACHANGE IN CONTEMPT OF THE PERMANENT  
INJUNCTION ORDER AND FOR AN ACCOUNTING AND FULL REMEDIAL RELIEF**

ARRIS Group, Inc. ("ARRIS") (a successor to nCUBE Corporation) hereby moves this Court for an order holding SeaChange International, Inc. in contempt of the Court's April 6, 2006 permanent injunction order for its actions in continuing to sell infringing products. ARRIS requests full remedial relief against SeaChange, including an award of damages, sanctions, and enforcement of the injunctive order to prevent SeaChange from further infringing activity. ARRIS also moves for an accounting in connection with SeaChange's infringement since the date of the last act of infringement for which it has paid damages.

The grounds for this Motion are set forth in ARRIS's opening brief and supporting papers being filed in support of this Motion.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Mary B. Graham*

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July 31, 2009  
3046041

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2009, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered participants.

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on July 31, 2009 upon the following individuals in the manner indicated:

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